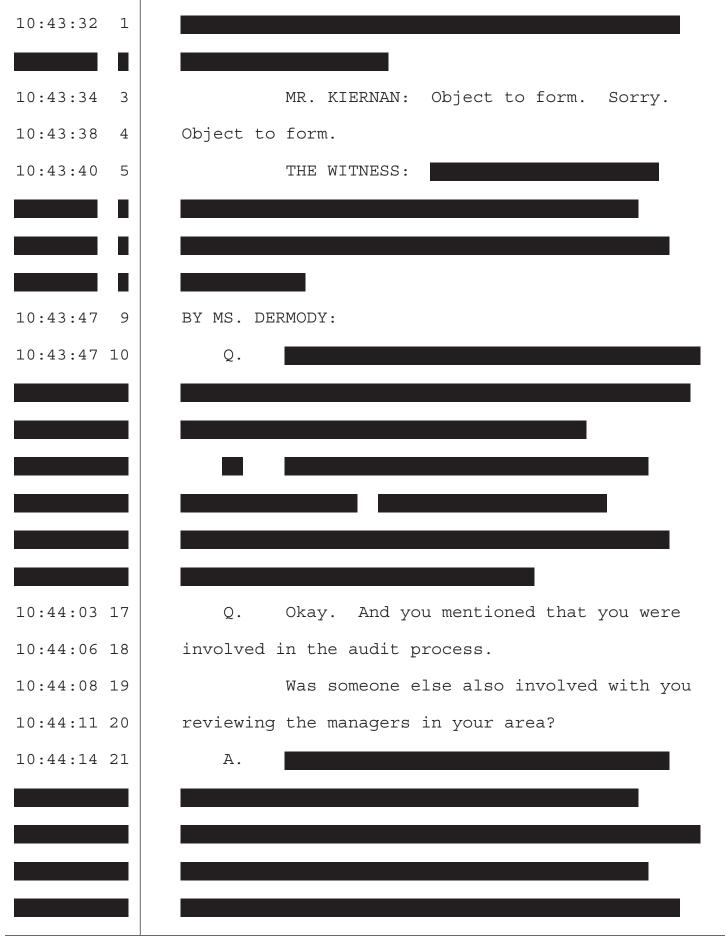
## **EXHIBIT J**

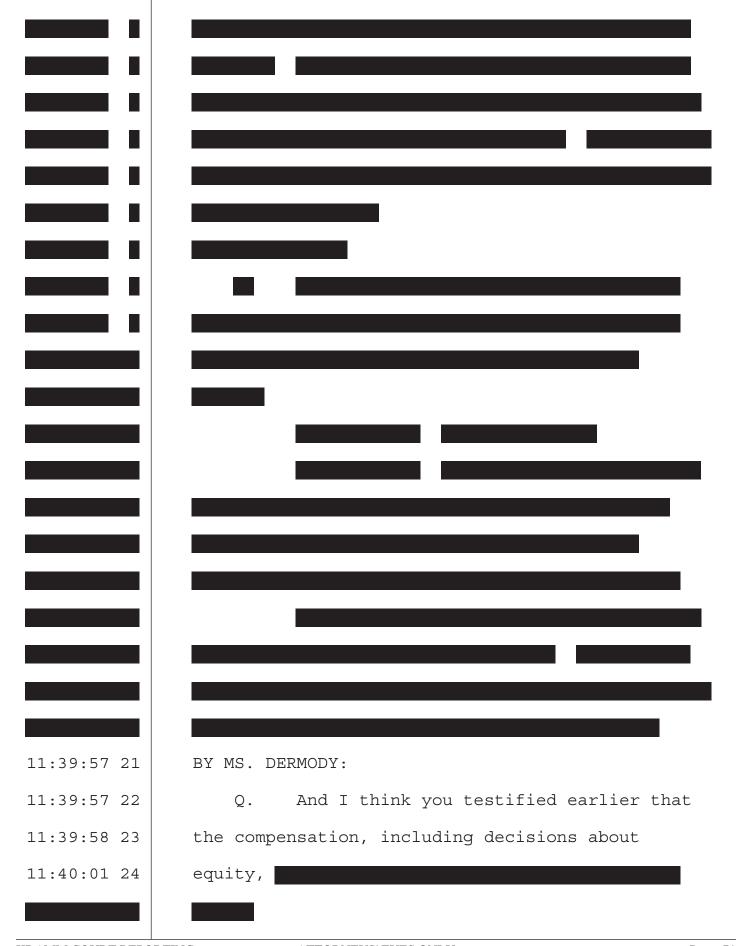
1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	SAN JOSE DIVISION
4	
5	IN RE: HIGH-TECH EMPLOYEE )
6	ANTITRUST LITIGATION )
7	) No. 11-CV-2509-LHK
8	THIS DOCUMENT RELATES TO: )
9	ALL ACTIONS.
10	)
11	
12	VIDEOTAPED DEPOSITION OF MASON STUBBLEFIELD
13	ATTORNEYS' EYES ONLY
14	Friday, March 29, 2013
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17	
18	
19	
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21	
22	
23	
24	Reported By:
25	KATHLEEN WILKINS, CSR #10068, RPR-RMR-CRR-CCRR-CLR



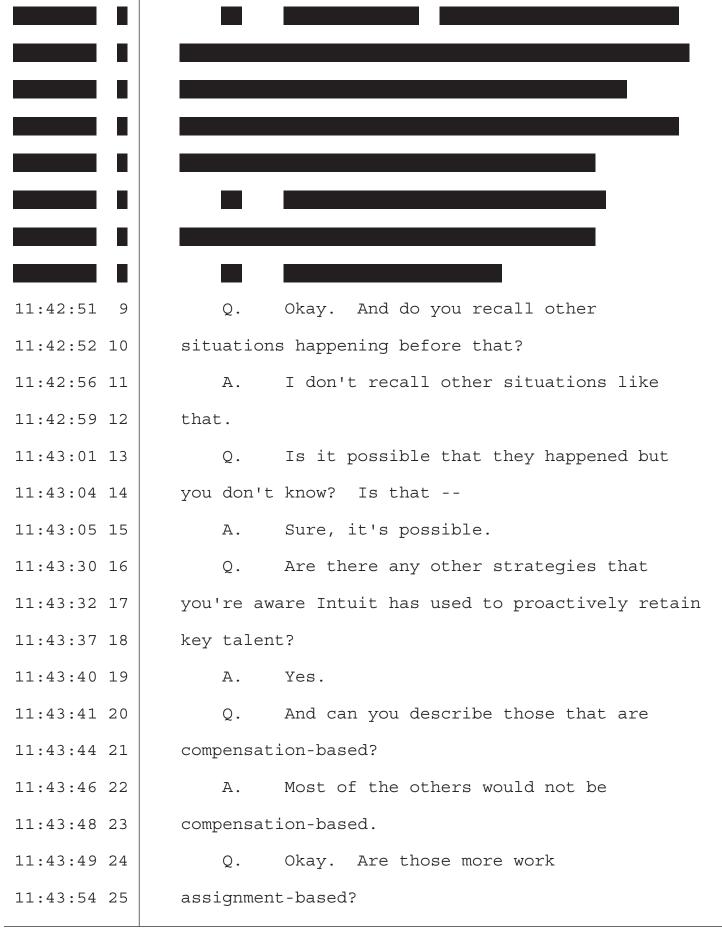


Deposition of Mason Stubblefield









11:43:56 1	A. It could be work assignment-based,
11:43:59 2	development-oriented, project work, learning and
11:44:03 3	development opportunities.
11:44:18 4	Q. Are there any other compensation-based
11:44:21 5	strategies to retain key talent that you're aware
11:44:24 6	Intuit has used that you haven't already
11:44:26 7	described?
11:44:28 8	A. No, I don't think so.
11:44:28 9	Q. Okay. Were you aware that at some point
11:44:40 10	in time, Intuit had a policy not to recruit into
11:44:44 11	certain companies?
11:44:46 12	A. I'm not aware of any policy like that.
11:44:48 13	Q. Okay. Did you become aware of that at
11:44:50 14	some point in time?
11:44:51 15	A. I'm not aware that Intuit ever had a
11:44:54 16	policy like that.
11:44:56 17	Q. Were you aware that there was a practice
11:44:58 18	at Intuit not to recruit into some companies?
11:45:01 19	A. No. No, I was not.
11:45:02 20	Q. Okay. It's not something you ever heard
11:45:04 21	anyone talk about?
11:45:05 22	A. No.
11:45:10 23	Q. Were you aware that Intuit was
11:45:13 24	investigated by the Department of Justice in
11:45:15 25	connection with recruiting into other companies?

11:45:17 1	A. Yes, I am aware of that.
11:45:19 2	Q. And when did you become aware of that?
11:45:22 3	A. Probably soon after it or at the time
11:45:25 4	it became public.
11:45:26 5	Q. Okay. And I'm aware that there's more
11:45:28 6	than one set of investigations, so the only one
11:45:31 7	I'm concerned about is the one involving this
11:45:34 8	case, if that's clear to you.
11:45:37 9	A. Okay.
11:45:38 10	Q. Did you participate in the Department of
11:45:39 11	Justice investigation on behalf of Intuit?
11:45:42 12	A. No, I did not.
11:45:43 13	Q. You weren't interviewed by DOJ?
11:45:45 14	A. No, I was not.
11:46:17 15	Q. That one has already been marked, so I
11:46:19 16	can pass it right to you. That should have the
11:46:22 17	deposition Exhibit 918.
11:46:25 18	Do you see that?
11:46:26 19	A. Yes.
11:46:28 20	Q. Have you seen this document before?
11:46:34 21	A. I have seen it before.
11:46:35 22	Q. Prior to preparing for your deposition,
11:46:37 23	had you seen this before?
11:46:38 24	A. No, I had not.
11:46:39 25	Q. Have you ever talked to Mr. McNeal about

## 

Deposition of Mason Stubblefield

11:46:42 1	a do not contact list at Intuit?
11:46:47 2	A. No.
11:46:49 3	Q. Or how about Mr. Nguyen?
11:46:51 4	A. No.
11:46:52 5	Q. Or Miss Ross?
11:46:52 6	A. No.
11:47:00 7	Q. Do you have any type of relationship
11:47:01 8	with Mr. Bill Campbell?
11:47:05 9	A. Yes.
11:47:06 10	Q. Okay. And do you have a regular
11:47:12 11	occasion to meet with him?
11:47:13 12	A. Yes.
11:47:14 13	Q. And what is that?
11:47:16 14	A. There's a couple of situations.

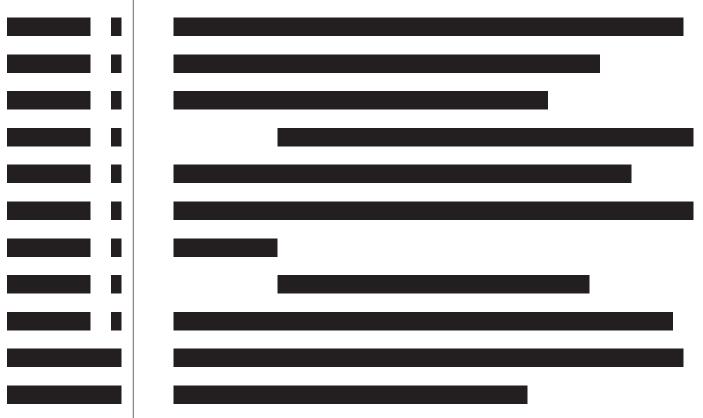
11:49:06	1	at any other companies in the valley about
11:49:09	2	recruiting issues?
11:49:11	3	A. What do you mean by "recruiting issues"?
11:49:14	4	Q. About whether there should be certain
11:49:16	5	people off limits to recruiting across companies?
11:49:19	6	A. No.
11:49:47	7	Q. Let me ask you about Mr. Steve Jobs.
11:49:50	8	Did you have any relationship with him
11:49:51	9	when he was at still at Apple?
11:49:58	10	A. No, none at all.
11:49:59	11	Q. Okay.
11:49:59	12	(Whereupon, Deposition Exhibit 2738
11:49:59	13	was marked for identification.)
11:50:10	14	BY MS. DERMODY:
11:50:10	15	Q. The document placed in front of you as
11:50:12	16	Exhibit 2738 should bear an Intuit number on the
11:50:15	17	front cover, -43557.
11:50:19	18	Do you see that?
11:50:19	19	A. Yes.
11:50:19	20	Q. And in the document, I don't think there
11:50:21	21	are page numbers themselves, so bear with me as we
11:50:24	22	go through this.
11:50:27	23	If you look at the document, is this a
11:50:30	24	document or a spreadsheet that you recognize as
11:50:33	25	being used in the compensation area at Intuit?

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Deposition of Mason Str		In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION
11:50:43 1	Α.	So yes.
11:50:44 2	Q.	And can you explain what this is?
11:50:50 3	A.	I can try.
11:50:52 4		

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11:52:00 1	table inside that system and how values were set.
11:52:02 2	So it's a screen shot of PeopleSoft.
11:52:05 3	Q. Okay.
11:52:05 4	A. So this document on its own could never
11:52:08 5	have been produced by itself just based on it
11:52:10 6	being a collection of different things.
11:52:11 7	Q. Okay. On that nine blocker control
11:52:17 8	section
11:52:17 9	A. Yes.
11:52:17 10	Q can you just walk me through what the
11:52:19 11	different columns are?
11:52:28 12	A. I'll try.
11:52:29 13	



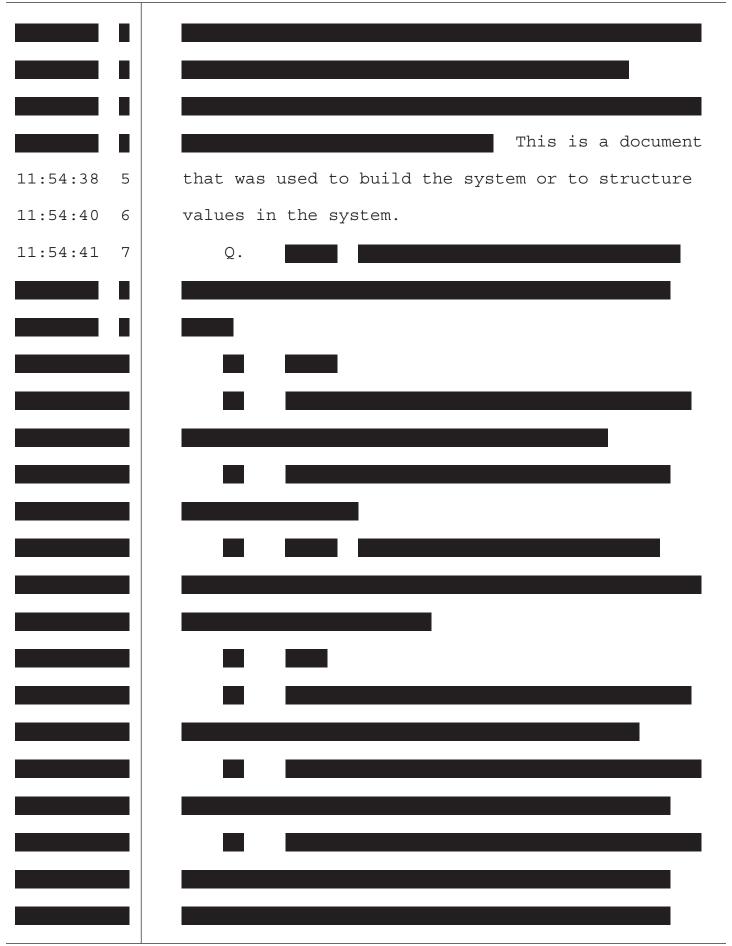
- Q. Okay. I'm not sure if the page that follows is an excerpt from the very last page or these are different things.
- A. It's similar to what's on the very last page, and so it may have been -- it may have been part of a working product to get to what would end up on that last page. So it's from an Excel file and it was essentially a way to build or manage the targets that got put back into the control table, the nine block control table.

This would be the basis for having -- having an input document to put those -- those values into the system.

11:54:12 23

11:54:16 24

11:53:36 12



11:55:48	1	
11:55:50	2	A. Yes.
11:55:51	3	Q. Okay.
11:55:52	4	A. That's correct.
11:56:38	5	Q. Mr. Stubblefield, the document placed in
11:56:39	6	front of you should have a number in the front,
11:56:41	7	Exhibit 1761.
11:56:44	8	Do you see that?
11:56:44	9	A. Yes.
11:56:47 1	.0	Q. If you'll open to the next page of it,
11:56:53 1	.1	it starts what appears to be a PowerPoint, or
11:56:55 1	.2	something like that, a presentation of some sort.
11:56:58 1	.3	Do you recognize what this is?
11:57:01 1	.4	A. So in looking at the presentation, I'm
11:57:04 1	.5	familiar with it. I don't remember the I don't
11:57:06 1	.6	know the exact context of how this was used.
11:57:09 1	.7	Q. If you look on the second page, there
11:57:12 1	.8	are page numbers in the lower left corner.
11:57:16 1	.9	A. Yes.
11:57:16 2	0	Q. Might be helpful.
11:57:18 2	1	You'll see that there is a date in the
11:57:19 2	2	middle where it says January 7, 2005.
11:57:22 2	3	Do you see that?
11:57:23 2	4	A. Yes.
11:57:24 2	:5	Q. And do you know in this time period who

1	I, Kathleen A. Wilkins, Certified
2	Shorthand Reporter licensed in the State of
3	California, License No. 10068, hereby certify that
4	the deponent was by me first duly sworn and the
5	foregoing testimony was reported by me and was
6	thereafter transcribed with computer-aided
7	transcription; that the foregoing is a full,
8	complete and true record of said proceedings.
9	I further certify that I am not of
10	counsel or attorney for either of any of the
11	parties in the foregoing proceeding and caption
12	named or in any way interested in the outcome of
13	the cause in said caption.
14	The dismantling, unsealing, or unbinding
15	of the original transcript will render the
16	reporter's Certificates null and void.
17	In witness whereof, I have hereunto set
18	my hand this day: April 4, 2013.
19	x Reading and Signing was requested.
20	Reading and Signing was waived.
21	Reading and signing was not requested.
22	
23	KATHLEEN A. WILKINS
24	CSR 10068, RPR-RMR-CRR-CCRR-CLR
25	